

JUDGE SWEET

11 CV 3185

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

ROBERT G. LOPEZ, an individual,

Plaintiff,

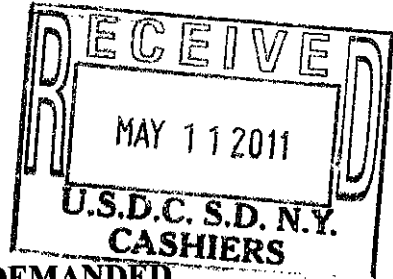
v.

THE GAP INC.,  
GAP INTERNATIONAL  
SOURCING, INC.,  
OLD NAVY, LLC; and  
OLD NAVY APPAREL, LLC

Defendants.

Civil Action No.

JURY TRIAL DEMANDED



**COMPLAINT FOR TRADEMARK INFRINGEMENT,  
UNFAIR COMPETITION AND RELATED CLAIMS**

Plaintiff, Robert G. Lopez, alleges his complaint against defendants, The Gap, Inc., Gap International Sourcing, Inc.; Old Navy, LLC and Old Navy Apparel, LLC as follows:

**NATURE OF THE ACTION**

1. This action arises from Defendants' infringement of Plaintiff's "ownership" and "use" rights in the mark LOWER EAST SIDE™, in conjunction with clothing, namely t-shirts. Despite Plaintiff being the registered owner of the trademark LOWER EAST SIDE™ and offering various clothing items under such brand name, the defendants' have infringed Plaintiff's rights in the LOWER EAST SIDE™ mark by selling, offering for sale and advertising t-shirts under Plaintiff's trademark. Plaintiff has already experienced "actual confusion" in connection with this matter and is likely to continue to experience confusion as to the affiliation or connection between the Defendants' and Plaintiff resulting in the unjust enrichment of Defendants' by using Plaintiff's registered trademark.

### **JURISDICTION AND VENUE**

2. This Court has jurisdiction over this action pursuant to 15 U.S.C. §1051 *et seq.*, 15 U.S.C. Sections 1114-1116; under Section 43(a) of the Trademark Act, 15 U.S.C. §1125(a) and Section 43(c) of the Trademark Act, 15 U.S.C. §1125(c).

3. This Court has personal jurisdiction over the defendants' because defendants are either corporations registered with the NYS Department of State Division of Corporations (See **Exhibit A**) and/or because defendants' engage in continuous and significant business activities in, and directed to the State of New York within this judicial district, and because defendants' have committed tortuous acts aimed at and causing harm within the State of New York and this judicial district.

4. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c) because it is where Plaintiff resides and the defendants' transact business and/or maintain an office or business location in this district, and because a substantial portion of the events giving rise to the asserted claims have occurred, and continue to occur, within this district. Furthermore, the damage to Plaintiff and its intellectual property described herein continues to occur in this judicial district.

### **THE PARTIES**

5. Plaintiff, Robert G. Lopez is an individual residing at 230 Clinton Street, Apt. #11C, New York, NY 10002.

6. Upon information and belief, Defendant The Gap, Inc. is a Delaware corporation with a principal place of business at 2 Folsom Street, San Francisco, California 94105.

7. Upon information and belief, Defendant Gap International Sourcing, Inc. is a California corporation with a principal place of business at 2 Folsom Street, San Francisco, California 94105.

8. Upon information and belief, Defendant Old Navy, LLC is a Delaware Limited Liability Company with an address at 2 Folsom Street, San Francisco, California 94105.

9. Upon information and belief, Defendant Old Navy Apparel, LLC is a California Limited Liability Company with an address at 2 Folsom Street, San Francisco, California 94105.

### **FACTS**

10. Since at least as early as 1997, Plaintiff Robert G. Lopez has been selling t-shirts, sweaters, hooded sweatshirts and other clothing items under the LOWER EAST SIDE™ brand name.

11. Since at least as early as 1999, Plaintiff has been independently operating a clothing business under the trade name L.E.S. CLOTHING CO.™, which has sold t-shirts, sweaters, hooded sweatshirts and other related clothing items under the marks LOWER EAST SIDE™ and LES NYC™.

12. In addition to selling and offering for sale clothing items under the LOWER EAST SIDE™ and LES NYC™ brand names, Plaintiff has also continuously sold and offered for sale various clothing items including t-shirts which bear the LOWER EAST SIDE™ mark in various fonts and design styles which are prominently displayed on the front and/or back of the t-shirts and/or sweaters. (See Exhibit B).

13. Plaintiff sells, and promotes the sale of his LOWER EAST SIDE™ clothing via his website [www.lesclothing.com](http://www.lesclothing.com), through order forms, and his t-shirts and sweaters are also available for sale in several retail locations in Lower Manhattan. (See Exhibit C).

14. Plaintiff advertises his LOWER EAST SIDE™ brand and clothing items through flyers, posters, stickers and through grass root street marketing methods such as painted “street murals.” Plaintiff also regularly conducts photo shoots of customers who purchase his LOWER

EAST SIDE™ clothing items to be included in magazine advertisements and marketing materials. (See **Exhibit D**).

15. Plaintiff's LOWER EAST SIDE™ clothing items have been featured in several music videos and one of Plaintiff's LOWER EAST SIDE™ mural's has been exhibited in an art museum in England.

16. Plaintiff is the registered owner of New York State Trademark Registration No. R31067 for the mark LOWER EAST SIDE™. (See **Exhibit E**).

17. Plaintiff is informed and believes and thereon alleges that Defendants collectively and in conjunction with each other have introduced and are marketing, selling, offering for sale and distributing clothing under the mark LOWER EAST SIDE.

18. In April of 2011, Plaintiff was contacted by one of his customer's and was asked if he was affiliated or behind the LOWER EAST SIDE™ T-Shirt that was being sold by Defendants'. Upon further investigating this matter, Plaintiff learned that the defendants' were in fact selling LOWER EAST SIDE™ t-shirts via the website [www.oldnavy.gap.com](http://www.oldnavy.gap.com). (See **Exhibit F**).

**FIRST CAUSE OF ACTION**  
**TRADEMARK INFRINGEMENT (15 U.S.C. §§ 1114-1116)**

19. Plaintiff repeats and realleges each and every allegation contained in Paragraphs 1 through 18 of this Complaint.

20. The use in commerce by Defendants of an identical and slightly identical version of Plaintiff's registered trademark is likely to cause confusion, mistake and deception among members of the public and in trade as to the source, origin, or sponsorship of defendants' goods and services. Such use by defendants constitutes a clear and direct infringement of Plaintiff's rights in and to Plaintiff's registered trademark, and has resulted in injury and damage to Plaintiff

that will continue if defendants are not ordered to cease all use of the LOWER EAST SIDE™ mark.

**SECOND CAUSE OF ACTION**  
**UNFAIR COMPETITION & FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))**

21. Plaintiff repeats and realleges each and every allegation contained in Paragraphs 1 through 20 of this Complaint.

22. Plaintiff has the exclusive right to market, brand and provide clothing related goods using the LOWER EAST SIDE™ mark.

23. Defendants by reason of the aforementioned acts, have falsely described, represented and designated the origin of its goods and services. Defendants' activities already have confused the public into believing that defendants and Plaintiff's clothing goods and accessories come from one and the same source, and defendants continued activities are likely to create further confusion and deceive the public concerning the source of the goods/services.

24. Defendants have unfairly profited from the actions alleged herein and will continue to unfairly profit and become unjustly enriched unless and until such conduct is enjoined by this Court.

25. By reason of Defendants willful acts conducted in conscious disregard for Plaintiff's rights, Plaintiff is entitled to treble damages under 15 U.S.C. § 1117(a).

**THIRD CAUSE OF ACTION**  
**COMMON LAW TRADEMARK INFRINGEMENT & UNFAIR COMPETITION**

26. Plaintiff repeats and realleges each and every allegation contained in Paragraphs 1 through 25 of this Complaint.

27. Defendants conduct constitutes deception by which Defendants' goods will be palmed off as those of Plaintiff. Such conduct constitutes trademark infringement and unfair competition in violation of the laws of the State of New York.

28. Defendants unauthorized use of Plaintiff's LOWER EAST SIDE mark is likely to continue to cause further confusion to the public as to the clothing goods and accessories of the respective parties.

29. By reason of the foregoing, Defendants have infringed and continue to infringe on Plaintiff's common law rights in the LOWER EAST SIDE™ mark and defendants have become unjustly enriched by such acts of infringement.

30. Defendants unlawful conduct has been and will continue to be willful or willfully blind to Plaintiff's rights, as Defendants have reason to know of Plaintiff's rights.

#### **FOURTH CAUSE OF ACTION UNJUST ENRICHMENT**

31. Plaintiff repeats and realleges each and every allegation contained in Paragraphs 1 through 30 of this Complaint.

32. Defendants have unjustly retained profits from the sale of clothing goods and accessories bearing Plaintiff's LOWER EAST SIDE™ mark.

33. Defendants actions constitute unjust enrichment.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully prays for relief as follows:

1. Entry of an order and judgment requiring that all defendants, their subsidiaries, officers, agents, servants, employees, owners, and representatives, and all other persons or

entities in active concert or participation with them, be preliminarily and, thereafter, permanently enjoined and restrained from (a) using in any manner the trade name, trademark, domain name or other indicia of origin, including in whole or part the term LOWER EAST SIDE™, or any colorable imitation thereof; (b) advertising, operating a website, using business stationary or offering any goods or services using the trade name, trademark, domain name, URL, or any other indicia of origin including in whole or part the term LOWER EAST SIDE™, or any colorable imitation thereof; (c) otherwise engaging in any acts of unfair competition and infringement which tend to injure Plaintiff's rights in the LOWER EAST SIDE mark.

2. That Defendants be required to account to Plaintiff for any and all profits derived by it, and to compensate Plaintiff for all the damages sustained by reason of the acts complained of herein, and that the damages herein be trebled pursuant to the Trademark Act.

3. That Defendants be ordered to deliver up for destruction any and all infringing materials bearing the LOWER EAST SIDE™ mark, and any colorable imitation thereof, in whole or part.

4. That Plaintiff be awarded punitive damages.

5. That Defendants be required to place advertisements or send notifications to past and present customers that it improperly has been using the LOWER EAST SIDE™ mark.

6. That Plaintiff be awarded the cost and disbursements of this action.

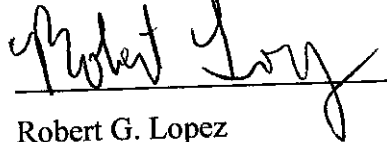
7. That Plaintiff have such other and further relief as the Court deems just and proper.

#### **JURY DEMAND**

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff hereby demands a trial by jury as to all issues.

Dated: May 11, 2011  
New York, NY

Respectfully submitted,  
Robert G. Lopez – Pro Se

A handwritten signature in black ink, appearing to read "Robert Lopez", is written over a horizontal line.

Robert G. Lopez  
Pro Se Plaintiff  
230 Clinton Street – Apt. #11C  
New York, New York 10002  
(917) 868-1698



## **EXHIBIT A**

# NYS Department of State

## Division of Corporations

### Entity Information

The information contained in this database is current through May 9, 2011.

Selected Entity Name: THE GAP, INC.

Selected Entity Status Information

**Current Entity Name:** THE GAP, INC.

**Initial DOS Filing Date:** JUNE 27, 1988

**County:** NEW YORK

**Jurisdiction:** DELAWARE

**Entity Type:** FOREIGN BUSINESS CORPORATION

**Current Entity Status:** ACTIVE

Selected Entity Address Information

**DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)**

C/O CT CORPORATION SYSTEM  
111 EIGHTH AVENUE  
NEW YORK, NEW YORK, 10011

**Chairman or Chief Executive Officer**

GLENN MURPHY  
2 FOLSOM STREET  
SAN FRANCISCO, CALIFORNIA, 94105

**Principal Executive Office**

THE GAP, INC.  
2 FOLSOM STREET  
SAN FRANCISCO, CALIFORNIA, 94105

**Registered Agent**

C T CORPORATION SYSTEM  
111 EIGHTH AVENUE  
NEW YORK, NEW YORK, 10011

This office does not record information regarding the names and addresses of officers, shareholders or directors of nonprofessional corporations except the chief executive officer, if provided, which would be listed above. Professional corporations must include the name(s) and address(es) of the initial officers,

# NYS Department of State

## Division of Corporations

### Entity Information

The information contained in this database is current through May 9, 2011.

Selected Entity Name: GAP INTERNATIONAL SOURCING, INC.

Selected Entity Status Information

Current Entity Name: GAP INTERNATIONAL SOURCING, INC.

Initial DOS Filing Date: JANUARY 29, 2009

County: NEW YORK

Jurisdiction: CALIFORNIA

Entity Type: FOREIGN BUSINESS CORPORATION

Current Entity Status: ACTIVE

Selected Entity Address Information

**DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)**

C/O CT CORPORATION SYSTEM  
111 EIGHTH AVENUE  
NEW YORK, NEW YORK, 10011

**Chairman or Chief Executive Officer**

GLENN MURPHY  
2 FOLSOM STREET  
SAN FRANCISCO, CALIFORNIA, 94105

**Principal Executive Office**

ATTN: BUSINESS LICENSE DEPT  
40 FIRST PLAZA CTR NW  
ALBUQUERQUE, NEW MEXICO, 87102

**Registered Agent**

CT CORPORATION SYSTEM  
111 EIGHTH AVENUE  
NEW YORK, NEW YORK, 10011

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# NYS Department of State

## Division of Corporations

### Entity Information

The information contained in this database is current through May 9, 2011.

Selected Entity Name: OLD NAVY, LLC

Selected Entity Status Information

**Current Entity Name:** OLD NAVY, LLC

**Initial DOS Filing Date:** FEBRUARY 19, 2004

**County:** ALBANY

**Jurisdiction:** DELAWARE

**Entity Type:** FOREIGN LIMITED LIABILITY COMPANY

**Current Entity Status:** ACTIVE

Selected Entity Address Information

**DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)**

C/O C T CORPORATION SYSTEM  
111 EIGHTH AVENUE  
NEW YORK, NEW YORK, 10011

**Registered Agent**

C T CORPORATION SYSTEM  
111 EIGHTH AVENUE  
NEW YORK, NEW YORK, 10011

This office does not require or maintain information regarding the names and addresses of members or managers of nonprofessional limited liability companies. Professional limited liability companies must include the name(s) and address(es) of the original members, however this information is not recorded and only available by viewing the certificate.

### \*Stock Information

# of Shares	Type of Stock	\$ Value per Share
No Information Available		

**EXHIBIT B**

# L.E.S. CLOTHING CO.™



EST. 1999

REP YOUR HOOD WITH AN EXCLUSIVE L.E.S. TEE!!!



MORE COLORS/STYLES AVAILABLE



MORE COLORS/STYLES AVAILABLE

ALPHABET  
CITY

MORE COLORS/STYLES AVAILABLE

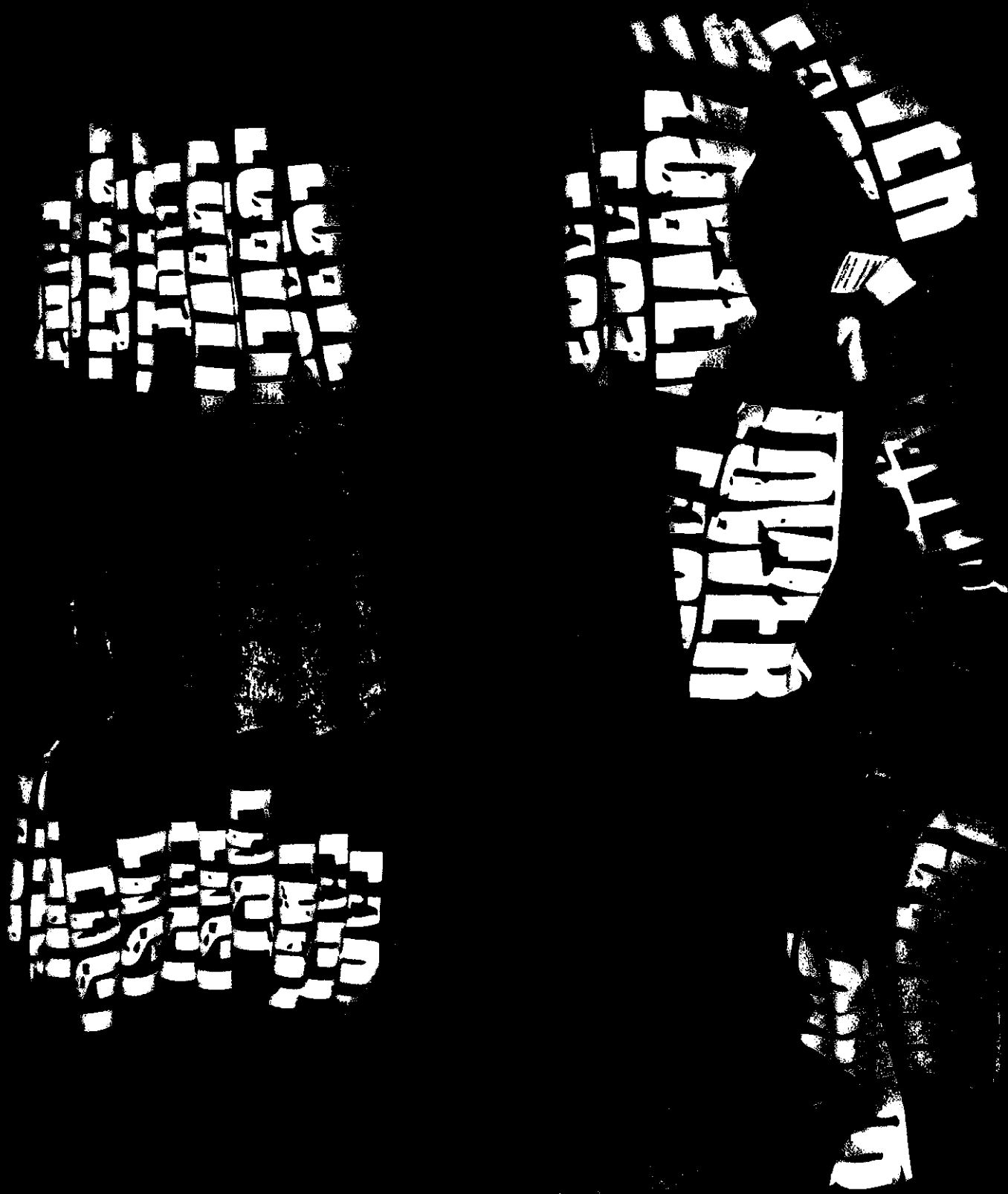
"Lower  
East  
Side"  
★★★★

MORE COLORS/STYLES AVAILABLE

MORE COLORS/STYLES AVAILABLE

FOR ORDERS AND ADDITIONAL INFORMATION CALL (800) 495-1539  
[www.LESCLOTHING.com](http://www.LESCLOTHING.com)

ALL DESIGNS AND/OR LOGOS ARE COPYRIGHTED AND TRADEMARKED WORKS AND  
THE PROPERTY OF L.E.S. CLOTHING CO.



## **EXHIBIT C**



MySpace

Learn More

Introducing the Nexus S

Google

Ads by Google

**L.E.S CLOTHING CO.™**



"REP YA HOOD WITH AN EXCLUSIVE LOWER EAST SIDE T-SHIRT"

Male  
101 years old  
NEW YORK, New York  
United States

Online Now!

Last Login:  
12/15/2010

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**Contacting L.E.S CLOTHING CO.™**

- |                |                   |
|----------------|-------------------|
| Send Message   | Forward to Friend |
| Add to Friends | Add to Favorites  |
| IM / Call      | Block User        |
| Add to Group   | Rank User         |

Myspace URL:  
[www.myspace.com/globalgclotching](http://www.myspace.com/globalgclotching)



**L.E.S CLOTHING CO.™'s Interests**

**General**

**L.E.S CLOTHING CO.**



FOR ORDERS OR OTHER INFO  
EMAIL  
LESCLOTHING@GMAIL.COM OR  
CALL (917)515-9333...WE  
WILL PERSONALLY DELIVER  
ANY OF OUR LOWER EAST  
SIDE T SHIRTS TO ANY  
LOCATION ON THE L.E.S. WE  
HAVE A LARGE VARIETY OF  
SIZES AND COLORS  
CURRENTLY AVAILABLE:  
S,M,L,XL,2X,3X,4X and 5X...

**Music**

DOWN BOTTOM DVD  
TRAILER COMMERCIAL



**L.E.S CLOTHING CO.™ GOT THEM  
WHITE/RED/BLUE LES TEES FOR THE  
FESTIVAL N PR PARADE...HOLLA @ YA BOY!!!**

2:22 PM Jun 11

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Fokis reps that LES set on HipHopGame.Com ([view more](#))

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**L.E.S CLOTHING CO.™'s Blurbs**

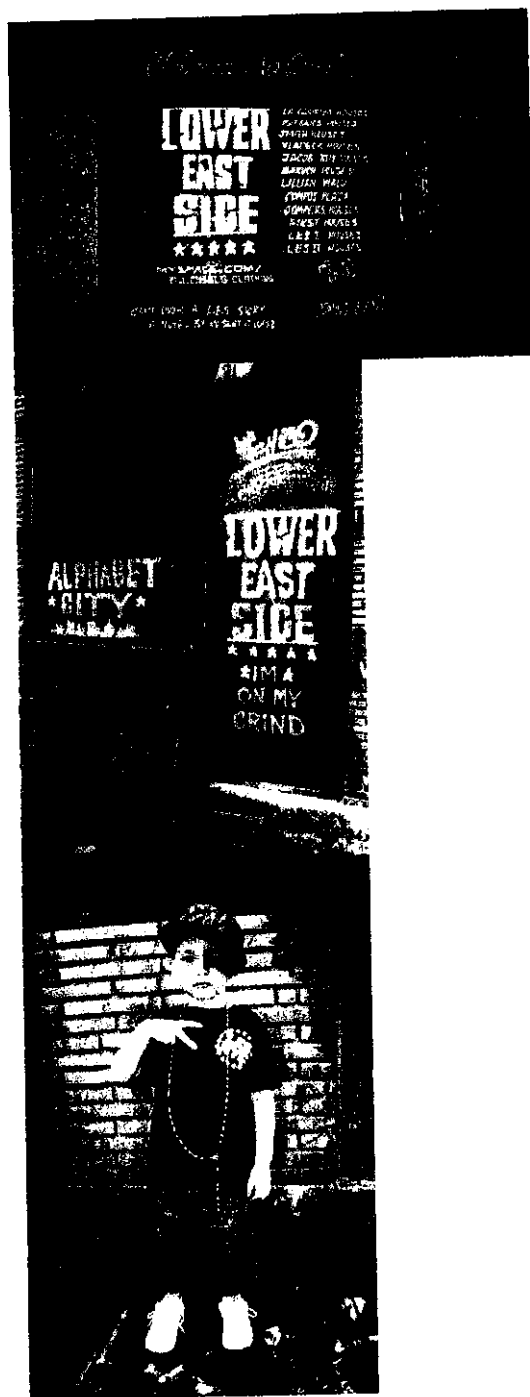
**About me:**

Rep Your Hood with an exclusive LOWER EAST SIDE t-shirt available from L.E.S. Clothing Co.™. We have a wide variety of LOWER EAST SIDE™ designs including LES NYC™, ALPHABET CITY™, THE LOWER™, THE 6 BORO™, etc.

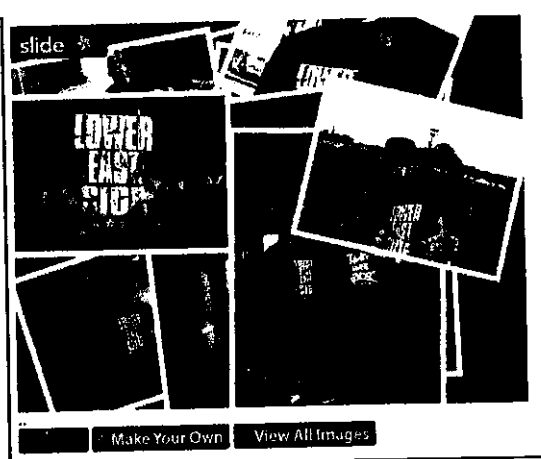
For orders please call (800) 495-1539 or email us at [lesclothing@gmail.com](mailto:lesclothing@gmail.com).



**Who I'd like to meet:**



Movies



L.E.S CLOTHING CO.'s Friend Space (Top 14)

L.E.S CLOTHING CO.™ has 445 friends.

GENETICtheorie



JoannaShari.co



Mileena  
Hayes  
twitter.com/mi  
leenshaze



Coco



MANHOOD  
RECORDS



FREAKYFRIGE



KRAZY  
HANDZ...RIP  
MARTIN "FACE"  
; WILSON!!



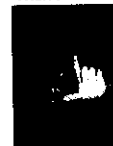
Durty  
Rob



DOUGHBOY  
HUSTLERS  
UNION  
PROD.



BEAUTIFULL  
THING L.E.S.



LES  
SMALLS™



[L|E|S|]  
[ENT.]



\*Speed aka  
Super Bad -  
Twitter.com/Sp  
eedTheSpartan\*



FaceLES



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L.E.S CLOTHING CO.'s Friends Comments

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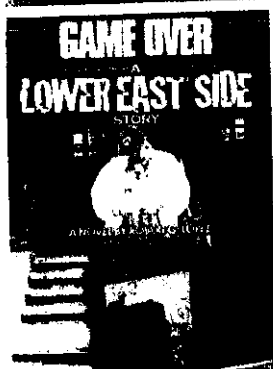
meconeproductions

Oct 6 2010 9:32 AM

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Make Your Own  
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NEW VIDEO "READY TO RIDE"

BY EASY & TRIPLE THREAT

PROD. BY MEC-ONE

DIR. BY BIG SKILLY



0:00 / 5:14

G3D

Jun 11 2010 2:19 PM

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Sham Da God





**DAY 5 STAR CHICK** ☐ ☐ ☐  
**May 5 2010 1:17 PM**  
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What's good homie holla at me I need some new giddy-up 4 da summer time :)

**"J.ONE&ONLY"**



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**L.E.S STAND THE FUK UP**



**LIMITED EDITION  
 SWAG/ JCONNECTS**



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HEY WHATS GOIN ON ...

JUS SLIDIN THRU TO BRING SUM OFFICIAL...  
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 LOVE TO YOUR PAGE...

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 GOD BLESS..

YA TU SABES/L.E.S./DINERO

AIM FLOW: DINERO51631  
 TWITTER @DINEROELDON  
 FACEBOOK: DONDINERO51631@GMAIL.COM

**only1jones**



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Hey Whats Goody?

*Six Lova  
be stand up!*

Jhoodz |@JhoodzRT

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big ups to L.E.S CLOTHING CO!!  
LOVING THE SHIRTS!!

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k

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thanks 4 the add!!! 6th boro Lova Deck for life.. L

JIMMY



Mar 3 2009 10:22 PM  
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E-CASHES FREEHAND FRIDAY WEEK 13



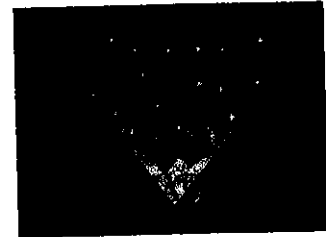
thanks for the add

THE OFFICIAL LOWER  
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I ♥  
L.E.S.



THE OFFICIAL LOWER  
EAST SIDE PAGE

Feb 11 2009 11:58 PM

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I ♥  
L.E.S.

L.E.S ALL FUCKIN DAY... WE  
INTERNATIONALLY KNOWN

\*\*FRANKI\*\*



Feb 10 2009 10:15 AM

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Papi Shank -  
Performing LIVE Sat  
8/7 in NY!

Feb 9 2009 3:49 AM

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THANX 4 THE SUPPORT!

CHECK OUT MY NEW VIDEO!



LOWER EAST SIDE T  
SHIRTS...COP YOURS NOW!!!

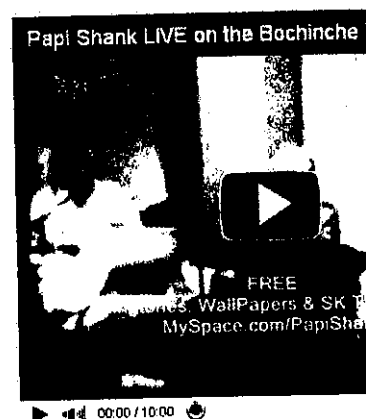


 THE T-SHIRTS BELOW  
ARE AVAILABLE IN MORE  
COLORS THEN ARE SHOWN ON  
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"LOG ON" vol.2?  
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Looking for EXPOSURE and/or some EXTRA CASH?

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Please vote for Jayden  
and Mikaila see my  
profile



♥Carmen♥

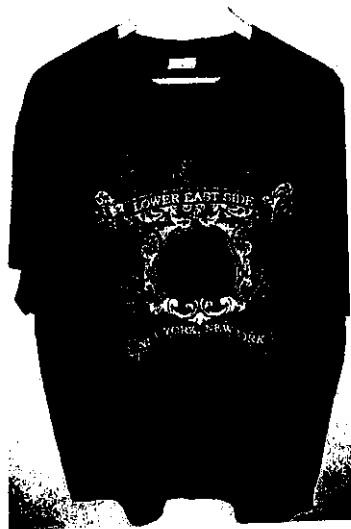


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# Showing love!

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MyHotComments thank you for adding me as a friend

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Evan ( LES )



You already know that the nigga's from the hood gotta get some love and ou already know that if the did accepted those L.E.S. gear up here I would of been rockin it to the fullest. You heard!! Representing the Lower hard body. Stay up!

**Nov 29 2008 12:04 PM**

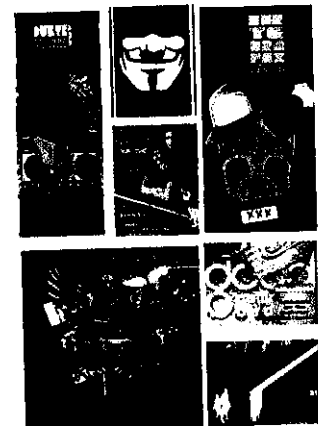
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Durte Rebelz LLC



To view all recent works click -->pics<----  
ALL RECENT ARTWORK

Things to have ready:  
Design info  
Email (for sending the contract)  
Contact email or phone number



The power to be great  
exists within us all...

DAT 5 STAR CHICK ( ) ( ) ( )

**Nov 27 2008 4:06 PM**

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Happy thanksgiving!!!!

B.A.D

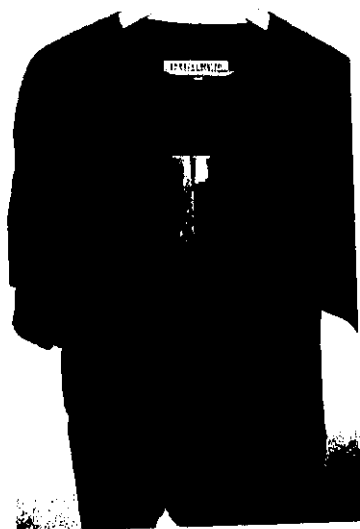
**Nov 24 2008 1:05 AM**

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WHAT IT DO ROB JUST SHOWING YOUR PAGE  
SOME L.E.S GANGSTA LOVE L.E.S UP!!!!





Sizes  
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#### L.E.S CLOTHING CO.™'s Details

Status: Married  
Hometown: Lower East Side  
Zodiac Sign: Taurus  
Children: Proud parent  
Education: College graduate



PAGE IS DONE! NO  
REQUESTS PLZ!

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Evan ( LES)

A-yo What's good. That sweater is official.  
Rapping that lower deck hard body. That's  
what it do. Just stopping by to show some luv &  
respect!! Holla!

Durty Rob



Oct 22 2008 2:51 PM  
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User

What up my brother Trade Mark Rob, It's  
getting frio out there, I need a hoody what's  
goody? (lmao) Yo let me know when you get  
some more of those champions with the zipper,  
I need a black one kidco, Peace



0 9 2



Oct 14 2008 11:14 AM

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whats good my dude!



REPRESENT YA HOOD WITH A CUSTOM "LOWER EAST SIDE™" T-SHIRT  
L.E.S. Clothing Co.™



\$19.99

SIZES CURRENTLY AVAILABLE: XL, 2X, 3X, 4X  
PHONE ORDERS (646) 651-0350

SHIP MY ORDER TO:

First Name: \_\_\_\_\_

Size # \_\_\_\_\_

Last Name: \_\_\_\_\_

Quantity: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_

State: \_\_\_\_\_

Zip: \_\_\_\_\_

Order by certified check or money order payable to: Robert G. Lopez, 230 Clinton Street #11C, New York, NY 10002  
Send \$19.99 + \$3.95 S&H per T-shirt; Allow 2 weeks for delivery  
For Wholesale Orders email: grobertlopez@aol.com

## **EXHIBIT D**





RN

# LOVER

# EMST

# SIDE

★ ★ ★ ★ ★

MYSPACE.COM/  
GLOBATECLUT

CAN'T TELL A L.F.S STORY  
NOVEL BY ROBERT C. MOORE

LA GUARDIA HOUSES  
RUTGERS HOUSES  
SMITH HOUSES  
VLADICA HOUSES  
JACOB THE HOUSE  
BARREN HOUSES  
LILLIAN WALD  
COMPOS PLAZA  
GOMPERS HOUSES  
FIRST HOUSES  
S 2 HOUSES  
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## **EXHIBIT E**

## New York State Department of State Certificate of Trademark Registration

I Daniel E. Shapiro, Special Deputy Secretary of State, do certify that the Trademark described below and depicted on the attached copy has been duly registered in this Department pursuant to Article 24 of the General Business Law. This registration will remain in force for TEN years from the Date of Registration.

Registration Number: R31067 Registration Date: 06/06/07

Applicant: ROBERT G. LOPEZ  
230 CLINTON STREET APT. #11C  
NEW YORK NY 10002-

State of Incorporation or  
Partnership Organization:

Class Numbers: 25

Date First Used in NYS: 12/1999

Date First Used Anywhere 12/1999

**Trademark Description:**

LOWER EAST SIDE

The mark is comprised of the words "Lower East Side" In stylized letters with an underline and overline.

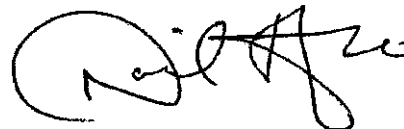
**Description of Goods:**

Clothing, namely, T-shirts, Hooded Sweatshirts, Vest, Hats and Caps as adopted from the USPTO.

WITNESS my hand and the seal of the State of New York In  
the City of Albany on this:

Thursday, August 16, 2007

by:



Special Deputy Secretary of State

DOS-690 (Rev. 3/01)



## **EXHIBIT F**

- Pants
- Polos
- Shirts
- Shorts
- Sweaters
- Swim
- Tees
- Shop Accessories
- Belts & Hats
- Shoes & Socks
- Sleepwear
- Underwear
- GiftCards

## Main Content



### Men's "Lower East Side Sports Club" Tees

Rated 4.5 stars Based on 2 ratings

Join the club! Vintage varsity-style graphics make this soft jersey tee the epitome of East Coast-cool.

regular • big • tall

Color: Ink Blue

~~\$14.50~~ \$7.99

#838314  
Prices may vary



Ink Blue product imagePining Away product image

Size:

☒ S ☐ M ☐ L ☐ XL  
Select size SSelect size MSize L  
L currently not availableSelect size XL

Quantity

Ink Blue

1

~~\$14.50~~ \$7.99

ABOUT THIS PRODUCT

#### fabric & care

- 100% cotton
- Machine wash.
- Imported.

#### overview

- Rib-knit crew neck
- Distressed "Lower East Side Sports Club" graphic across chest
- Tag-free for added comfort
- Pieced trim inside neck and shoulders for added durability
- Soft, medium-weight jersey

#### fit & sizing

review summary

Rated 4.5 stars  
Based on 2 ratings

Overall size: 2 of 2 say true to size

Sleeves: 2 of 2 say as expected

Length: 2 of 2 say as expected

Chest: 2 of 2 say true to size

Shoulders: 2 of 2 say true to size

Write a review | See all reviews